



May 13, 2020

By ECF

Hon. Richard M. Berman
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

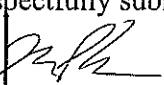
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Re: United States v. Christopher Santos Felix;
Docket Number: 19-cr-228

Your Honor,

I represent the Defendant in the above-referenced matter along with Javier A. Solano, Esq. This case is scheduled for a sentencing on May 28, 2020. However, I write with consent of AUSA Kedar Bhatia to respectfully request that this date be adjourned by three-weeks. The reason for this request is three-fold. First, the investigation by Mr. Santos-Felix's mitigation expert has not been finalized because the specialist - REY CUSICANQUI has had to deal with the death of a client and limited access to Mr. Santos-Felix at the MDC due to the COVID-19 restrictions which has delayed his work. Additionally, Mr. Solano has had a COVID death in his wife's family which has impacted his ability to handle ordinary office duties. Finally, due to my wife's schedule I have been full-time caregiver and school teacher to our two children (7 and 3.5) and have been unable to attend to my ordinary office duties. Given these unexpected set-backs and the fact that the defendant has another open case and there would be negligible impact from the requested delay, the parties respectfully request that Your Honor grant this request. This is the defendant's third request for an adjournment of the sentence date. I thank the Court for its attention to this matter.

Respectfully submitted,


Michael P. Kushner, Esq.

Sentence is adjourned to 6/24/2020
at 11:00am. Defense submission
is due 6/8/2020. Government
submission is due 6/15/2020.

Cc: AUSA Kedar Bhatia
(Via ECF)

SO ORDERED: Richard M. Berman 16 Court Street, 36th Floor • Brooklyn, New York 11241
Date: 5/14/2020 718.504.1141 (telephone) • 718.504.4630 (facsimile)
Richard M. Berman, U.S.D.J. www.KushLawGroup.com